

United States District Court

SOUTHERN

DISTRICT OF
McALLEN DIVISION

TEXAS

UNITED STATES OF AMERICA
V.

CRIMINAL COMPLAINT

Johnathon Mathew Martinez

Principal

Case Number:

YOB: 1999

United States

M-19-1515-M

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about June 26, 2019 in Hidalgo County, in the Southern District of Texas defendants(s) did,
(Track Statutory Language of Offense)

knowing or in reckless disregard of the fact that Miguel Angel Martinez-Ramirez a citizen and national of El Salvador and Jose Wilmer Mejia-Gomez a citizen and national of Honduras, for a total of two (2), who have entered the United States in violation of law, did knowingly transport, or move or attempted to transport or move said aliens in furtherance of such violation of law within the United States, that is, from a location near Edinburg, Texas to another location near Edinburg, Texas, by means of a motor vehicle.

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(ii) FELONY

I further state that I am a(n) U.S. Border Patrol Agent and that this complaint is based on the following facts:

On June 26, 2019, Border Patrol Agents responded to a request for assistance from the Edinburg Police Department at the TA truck stop in Edinburg, Texas.

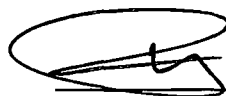
Upon arrival to the truck stop, an agent made contact with the police officer. The officer advised that he had performed a traffic stop on a maroon Chevrolet pick up for failure to stop at a designated point. The officer then requested identification from the driver to which he provided the officer a Texas drivers license. The officer observed two (2) passengers exhibiting nervous behavior and requested their identification. Both subjects presented the officer with foreign identification cards. Suspecting that the two (2) passengers were undocumented aliens, the officer requested the assistance of Border Patrol.

SEE ATTACHMENT

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No

Approved by: Jimmy Leo
AUS A



Signature of Complainant

Robert Ramirez Border Patrol Agent

Printed Name of Complainant

Sworn to before me and subscribed in my presence,

June 28, 2019 — 8:43am.
Date

at McAllen, Texas
City and State

Juan F. Alanis, U. S. Magistrate Judge
Name and Title of Judicial Officer



Signature of Judicial Officer

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN, TEXAS**

ATTACHMENT TO CRIMINAL COMPLAINT:

M-19-1515-M

RE: Johnathon Mathew Martinez

CONTINUATION:

Agents proceeded to interview all three (3) subjects as to their citizenship. The driver, later identified as Johnathon Mathew Martinez, was determined to be a United States citizen. The two (2) passengers were determined to be citizens and nationals of Honduras and El Salvador. Suspecting that an alien smuggling event was taking place, the agent read Martinez his Miranda warning.

All subject were taken into custody and transported to the Weslaco Border Patrol station for processing.

Principal Statement:

Johnathon Mathew Martinez was read his Miranda Rights. Martinez understood his rights and agreed to provide a statement without the presence of an attorney.

Martinez stated that he received a phone call from a subject whom he knows as "Gordo" asking him to pick up some undocumented aliens in Edinburg, Texas. Martinez was told by "Gordo" to pick up the aliens at 3714 Munoz St. in Edinburg, Texas and was to transport them to Houston, Texas. This address was known to Martinez, as he admitted to picking aliens up from this property on previous occasions. Martinez stated that he was to be paid a sum of \$300 per smuggled alien. Martinez further stated that he was going to drop off the subjects south of the Falfurias Border Patrol checkpoint, and then pick them up once they had passed the checkpoint.

Material Witnesses Statements:

Miguel Angel Martinez-Ramirez was read his Miranda Rights. Martinez understood his rights and agreed to provide a statement without the presence of an attorney.

Martinez stated that he made his smuggling arrangements with a subject in El Salvador and was to pay a sum of \$3000 USD to get smuggled to Houston, Texas. Martinez stated that he crossed the Rio Grande River on a raft and that once in the United States, a subject in a car picked him up and transported him to a house. Martinez stated that he stayed at the house until being picked up by a male subject in a maroon truck. Martinez later identified Johnathon Mathew Martinez as the subject who picked him up.

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CONTINUATION:

Jose Wilmer Mejia-Gomez was read his Miranda Rights. Mejia understood his rights and agreed to provide a statement without the presence of an attorney.

Mejia stated that his brother made arrangements with a smuggler in Honduras to have him smuggled to Philadelphia, Pennsylvania for a fee of \$10,000 USD. Mejia stated that he crossed the river on a raft and was escorted to a waiting vehicle after making his entry. The driver then transported Mejia to a residence. Mejia stated that he stayed at the residence for a few days before being picked up by a truck. After being picked up, Mejia stated that they were pulled over by police.

Mejia identified Johnathon Mathew Martinez as the driver of the truck.